

December 2, 2014

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

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PUBLIC SERVICE
COMMISSION

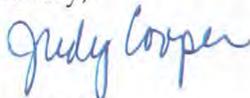
RE: Case No. 2010-00365

Dear Mr. Derouen:

Pursuant to the Commission's Order issued on November 23, 2010, in the above referenced case, Columbia Gas of Kentucky, Inc. ("Columbia") submits an original and ten (10) redacted copies of its Final Gas Price Hedging Plan Report for the 2014-2015 season. Columbia's hedging plan and initial hedging report were granted confidential treatment in Case No. 2004-00462. Columbia requests confidential treatment for its hedging plan reports in the Petition for Confidentiality attached hereto.

If you have questions, please don't hesitate to contact me at 859-288-0242 or jmcoop@nisource.com.

Sincerely,



Judy M. Cooper
Director, Regulatory Policy

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:)
)
THE APPLICATION OF COLUMBIA GAS)
OF KENTUCKY, INC. TO IMPLEMENT A)
NEW SMALL VOLUME GAS TRANS-)
PORTATION SERVICE, A GAS PRICE)
HEDGING PLAN, AN OFF-SYSTEM)
SALES AND CAPACITY RELEASE REVE-)
NUE SHARING MECHANISM, AND A)
GAS COST INCENTIVE MECHANISM.)

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PUBLIC SERVICE
COMMISSION

Case No. 2004-00462

**PETITION OF COLUMBIA GAS OF KENTUCKY, INC.
FOR CONFIDENTIAL TREATMENT OF
COLUMBIA'S FINAL HEDGING REPORT**

Columbia Gas of Kentucky, Inc. ("Columbia") respectfully petitions the Kentucky Public Service Commission ("Commission"), pursuant to 807 KAR 5:001, Section 7, for confidential treatment of Columbia's Final Hedging Report for the 2013-2014 heating season, attached hereto.

1. On March 29, 2005, the Commission entered an Order in this proceeding approving Columbia's hedging program.¹ The Order directed Columbia

¹ By Order dated November 23, 2010 in Case No. 2010-00365 the Commission authorized Columbia to extend its hedging program through March 31, 2015.

to file an initial hedging report and a final hedging report for each heating season. On September 17, 2014, the Commission entered an Order in Case No. 2013-00354, denying the extension of the hedging program and ordering Columbia gas of Kentucky to cease all hedging activities as of September 17, 2014.² Therefore, this Hedging Report will be Columbia's final Hedging Report pursuant to the authority previously granted on March 29, 2005.

2. The attachment to this Petition contains Columbia's Final Hedging Report for the 2014-2015 heating season.³ The Final Hedging Report contains sensitive pricing information and confidential information about Columbia's hedging strategies.

3. Coincident with the filing of its Application in this docket on November 30, 2004, Columbia also filed a Petition for Confidential Treatment of Data. Under Columbia's Gas Price Hedging Plan ("Plan"), a historically based Benchmark Price is derived from winter period price information. Trigger Prices are then determined based on the Benchmark Price. Each Trigger Price has a specified quantity of Columbia's winter gas purchase requirements associated with it.

² See, Case No. 2013-00354, *In the Matter of the Application of Columbia Gas of Kentucky, Inc., to Extend its Gas Price Hedging Plan* (Ky. PSC Sept. 17, 2014).

³ Pursuant to 807 KAR 5:001, Section 7, attached to the original copy of this Petition, and filed under seal, is a copy of the Final Hedging Report with the confidential information identified by yellow highlighting. All other copies of this Petition include as the attachment the Final Hedging Report with the confidential information redacted.

Columbia will hedge the price on specified gas quantities that are to be purchased in future winter months when the New York Mercantile Exchange winter strip price is less than or equal to a Trigger Price. Columbia's earlier Petitions for Confidential Treatment of Data requested confidential treatment for that part of the Plan that identifies information about the Trigger Prices, and the quantities of gas to be hedged at the identified Trigger Prices.

4. The Trigger Price information is confidential and proprietary, and, if publicly disclosed would damage Columbia's competitive position and business interests by providing competitors and financial traders with information that would enable them to determine the timing and approximate volume of Columbia's hedging activity, which might enable them to take financial positions based on that knowledge to the detriment of Columbia's ability to obtain the lowest cost gas for its customers and its ability to compete for customers. This Trigger Price information is not disclosed to the public, and is being provided only to the Commission in compliance with 807 KAR 5:001, Section 7.

5. By letter dated December 17, 2004, the Commission granted Columbia's request for confidential treatment of the Plan.

6. The information contained in Columbia's Final Hedging Report might allow one to ascertain Columbia's sensitive Trigger Price information.

Consistent with the Commission's December 17, 2004, decision to grant confidential treatment to Columbia's plan, the Final Hedging Report should also be granted confidential treatment. In view of the foregoing considerations, the data should be classified as confidential, pursuant to KRS §§ 61.870 *et seq.*, on the following specific grounds:

- (1) Trigger Price information is exempt from disclosure pursuant to KRS § 61.878(1)(c)(1) because the information would permit an unfair commercial advantage to Columbia's competitors, and to financial traders with whom Columbia might be negotiating for the purchase of the financial instruments necessary to implement Columbia's gas price hedging plan.
- (2) All the information provided herewith is further exempt from disclosure pursuant to KRS 61.878(1)(l), which exempts "information the disclosure of which is prohibited or restricted or otherwise made confidential by enactment of the General Assembly." This is so because the Trigger Price information constitutes "data" which "[d]erives independent economic value...from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use..." It is also kept con-

confidential by Columbia, and is therefore “the subject of efforts that are reasonable under the circumstances to maintain its secrecy.” As a result, the Trigger Price data constitutes “trade secrets” within the meaning of KRS § 365.880(4)(a) and (b), and its disclosure is either prohibited or restricted by the express provisions of §§ KRS 365.880 through 365.894.

7. By granting this Petition and providing for confidential treatment of Columbia’s Final Hedging Report, the Commission can fully evaluate Columbia’s hedging activities, while maintaining the general confidentiality of such data, thereby balancing the public interest with the private competitive interest in such information.

WHEREFORE, Columbia respectfully requests that the Commission issue an order authorizing the confidential treatment of Columbia’s Final Hedging Report for the 2013-2014 heating season attached hereto, pursuant to 807 KAR 5:001, Section 7, for the reasons stated herein.

Dated at Columbus, Ohio, this ^{2nd} 1st day of December 2014.

Respectfully submitted,
COLUMBIA GAS OF KENTUCKY, INC.

By: Stephen B. Seiple (gmc)
Stephen B. Seiple
Asst. General Counsel

Stephen B. Seiple, Asst. General Counsel
200 Civic Center Drive
P.O. Box 117
Columbus, Ohio 43216-0117
Telephone: (614) 460-4648
Fax: (614) 460-6986
Email: sseiple@nisource.com

Richard S. Taylor
225 Capital Avenue
Frankfort, Kentucky 40601
Telephone: (502) 223-8967
Fax: (502): 226-6383

Attorneys for
COLUMBIA GAS OF KENTUCKY, INC.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petition for Confidential Treatment of Columbia Gas of Kentucky, Inc. was served upon those individuals listed in the Service List below by regular U.S. mail this ~~1st~~^{2nd} day of December 2014.

Stephen B. Seiple (gmc)

Stephen B. Seiple

Attorney for

COLUMBIA GAS OF KENTUCKY, INC.

SERVICE LIST

Hon. Elizabeth E. Blackford
Hon. Dennis G. Howard II
Assistant Attorneys General
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601-8204

Hon. Joe F. Childers
201 W. Short Street
Suite 310
Lexington, KY 40507

Hon. James R. Cox
Cox, Bowling and Johnson PLLC
8303 Shelbyville Road
Louisville, KY 40222

Hon. Leslye M. Bowman
Hon. David J. Barberie
Lexington-Fayette Urban County Government
Department of Law
200 East Main Street
Lexington, KY 40507

Hon. John W. Bentine
Chester, Willcox & Saxbe, LLP
65 East State Street
Suite 1000
Columbus, OH 43215-4213

Hon. Trevor L. Earl
Reed, Weitkamp, Schell & Vice PLLC
500 West Jefferson Street, Suite 2400
Louisville, KY 40202-2812

COLUMBIA GAS OF KENTUCKY
GAS PRICE HEDGING PLAN REPORT
ANNUAL REPORT
NOVEMBER 30, 2014

Columbia Gas of Kentucky, Inc.
 Gas Price Hedging Plan Report
 November 2014 - March 2015

Date of Purchase	Financial or Physical Contract	Dth Purchased November	Dth Purchased December	Dth Purchased January	Dth Purchased February	Dth Purchased March	Dth Purchased Winter	Percent of Forecasted Firm Non-Storage Firm Demand	Purchase Price	NYMEX Sale Price
	Financial						900,000	31.12%		
	Financial						300,000	10.37%		
Total Hedged							1,200,000	41.49%		
Average Price per Dth										

Date of Purchase: The date the contracts were purchased.

Financial or Physical Contract: Whether the contract was a NYMEX Gas Futures contract or a contract for physical natural gas supplier with one of Columbia's gas suppliers.

Dth Purchased: The volume in Dth of the contract for each winter month.

Percent of Firm Non-Storage Flowing Supply: The percentage of the forecasted non-storage firm demand for represented by the each hedge contract.

Purchase Price: The price paid per Dth for the NYMEX contract volumes.

NYMEX Sale Price: If the contract is a financial contract, the price at which the contract volume was sold.

CONFIDENTIAL

Columbia Gas of Kentucky, Inc.
 Gas Price Hedging Plan Report
 November 2015 - March 2016

12/01/14

Program Terminated

Date of Purchase	Financial or Physical Contract	Dth Purchased November	Dth Purchased December	Dth Purchased January	Dth Purchased February	Dth Purchased March	Dth Purchased Winter	Percent of Forecasted Firm Non-Storage Firm Demand	Purchase Price	NYMEX Sale Price
Total Hedged							0	0.00%		
Average Price per Dth										

Date of Purchase: The date the contracts were purchased.

Financial or Physical Contract: Whether the contract was a NYMEX Gas Futures contract or a contract for physical natural gas supplier with one of Columbia's gas suppliers.

Dth Purchased: The volume in Dth of the contract for each winter month.

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